HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON

CONTINENTAL CASUALTY COMPANY

Plaintiff,

11 v.

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12 ROSALINDA HERRERA HEREDIA,

individually and as parent and guardian of A.R.H., a minor; JUAN REYES TAPIA;

LESLIE REYES-HERRERA; ANA HERRERA HEREDIA, individually and as parent and

guardian of E.H., a minor; EDUARDO 15

HERNANDEZ HERRERA; SAMPSON

KWAKU GYAN and GEORGINA

TWUMWAA GYAN, both individually and as parents and guardians of M.G., a minor;

AMANDA POMAA GYAN; FRANCIS

KWADWO GYAN; ANGELINA ADOMA

GYAN; MEUY CHANG SAETURN and

BUON DUANGPRASAERT, both individually and as parents and guardians of A.D., a minor;

GIFTY EGHAN; JOYCE MENSAH,

individually and as parent and guardian of E.D.,

a minor, JUSTIN ALEXANDER (as assignees of VIP International Real Estate Group, Inc.);

and VIP International Real Estate Group, Inc., a Washington corporation,

Case No. 2:24-cv-00917

STIPULATED MOTION AND (PROPOSED) ORDER MODIFYING **BRIEFING SCHEDULE**

NOTE ON MOTION CALENDAR:

December 9, 2024

Defendants.

STIPULATED MOTION AND [PROPOSED] ORDER MODIFYING BRIEFING SCHEDULE - 1 Case No. 2:24-cv-00917

DLA Piper LLP (US) 701 Fifth Avenue, Suite 6900 Seattle, WA 98104-7029 | Tel: 206.839.4800

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Plaintiff Continental Casualty Company ("Continental"), and Defendant VIP International Real Estate Group, Inc. ("VIP") stipulate and agree as follows and request that the Court enter an order consistent with the following:

- 1. On November 18, 2024, VIP filed a motion to dismiss Continental's claims against VIP in this case, with a noting date of December 20, 2024. Dkt. No. 29. Pursuant to Local Civil Rule 7(d)(4), Continental's response date would ordinarily be due on December 9, 2024.
- 2. VIP and Continental have conferred and agreed to extend Continental's response deadline until December 13, 2024, to account for the Thanksgiving holiday. The parties agree that VIP's reply and the noting date for the motion shall remain December 20, 2024.
- 3. Accordingly, VIP and Continental respectfully request that the Court extend Continental's response deadline to December 13, 2024.

Dated this 9th day of December, 2024

DLA PIPER LLP (US)

INSLEE BEST DOEZIE & RYDER

s/ Mark S. Leen

s/ Anthony Todaro
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Austin Rainwater, WSBA No. 41904
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Attorneys for Plaintiff Continental Casualty Company

Attorneys for Defendant VIP International Real Estate Group, Inc.

STIPULATED MOTION AND [PROPOSED] ORDER MODIFYING BRIEFING SCHEDULE - 2 Case No. 2:24-cv-00917

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1 **ORDER** IT IS SO ORDERED. 2 3 Dated this 9th day of December, 2024. 4 oh C Coyhu u 5 6 HONORABLE JOHN C. COUGHENOUR 7 United States District Judge PRESENTED BY: 8 DLA PIPER LLP (US) INSLEE BEST DOEZIE & RYDER 9 10 s/ Anthony Todaro <u>s/ Mark S. Leen</u> Anthony Todaro, WSBA No. 30391 Mark S. Leen, WSBA No. 35934 11 Austin Rainwater, WSBA No. 41904 Kyung Sun Park, WSBA No. 59912 701 Fifth Avenue, Suite 6900 10900 NE 4th Street 12 Seattle, Washington 98104-7029 Bellevue, WA 98004 (206) 839-4800 (425) 455-1234 Tel: 13 (206) 839-4801 E-mail: mleen@insleebest.com Fax: E-mail: anthony.todaro@us.dlapiper.com E-mail: kpark@insleebest.com 14 E-mail: austin.rainwater@us.dlapiper.com Attorneys for Defendant VIP International 15 Attorneys for Plaintiff Continental Casualty Real Estate Group, Inc. Company 16 17 18 19 20 21 22 23 24 25

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CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorney of record for the parties.

Dated this 9th day of December, 2024.

s/Jacey Bittle

Jacey Bittle, Legal Executive Assistant

STIPULATED MOTION AND [PROPOSED] ORDER MODIFYING BRIEFING SCHEDULE - 4 Case No. 2:24-cv-00917

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